

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
EASTERN DIVISION



UNITED STATES OF AMERICA

v.

FIRST SUPERSEDING INDICTMENT

CRIMINAL NO. 2:14cr6KS-MTP

LORENA GOMEZ	18 U.S.C. § 1028(f)
JOSE MARTELL RIVERA a/k/a Carlos	18 U.S.C. § 1028(a)(7)
YOLANDA JEAN PERKINS	
DEBORAH PAYTON STEWART	
SOLOMON ROBOLLAR-OSORIO	
ARTURO ROBOLLAR-OSORIO	
JORGE BARRAGAN-MUNGUIA	
DANIEL CARDENAS	
JAVIER GUITERREZ-PULIDO	
JOSE MORENO-VARGAS	
JOSE MORENO-CHAVEZ	
JUAN CHAVEZ-MORFIN	
JOEL CABALLERO	
JUSTO LEMUS PEREZ	
JESUS ALVAREZ	
JOET ALVERDIN-HERNANDEZ	

The Grand Jury charges:

Count 1

That from on or about December 1, 2013 continuing through on or about January 17, 2014, in Jones County in the Eastern Division of the Southern District of Mississippi and elsewhere, the defendants, **LORENA GOMEZ, JOSE MARETLL RIVERA a/k/a Carlos, YOLANDA JEAN PERKINS, and DEBORAH PAYTON STEWART**, knowingly and willfully conspired and agreed together and with each other, and with other persons both known and unknown to the grand jury to traffic in false or actual authentication features, to wit, birth certificates and social security cards, for use in false identification documents, document-making

implements, or means of identification, and the offense involved the production or transfer of an identification document, authentication feature, or false identification document that is or appears to be (i) an identification document or authentication feature issued by or under the authority of the United States; or (ii) a birth certificate, or a driver's license or personal identification card as prohibited by 18 United States Code Section 1028(a)(8), (b)(1).

All in violation of Section 1028(f), Title 18, United States Code.

Count 2

On or about January 17, 2014, in Jones County in the Eastern Division of the Southern District of Mississippi and elsewhere, the defendants, **LORENA GOMEZ, JOSE MARETLL RIVERA a/k/a Carlos, YOLANDA JEAN PERKINS, DEBORAH PAYTON STEWART, SOLOMON ROBOLLAR-OSORIO, ARTURO ROBOLLAR-OSORIO, JORGE BARRAGAN-MUNGIUA, DANIEL CARDENAS, JAVIER GUITERREZ-PULIDO, JOSE MORENO-VARGAS, JOSE MORENO-CHAVEZ, JUAN CHAVEZ-MORFIN, JOEL CABALLERO, JUSTO LEMUS PEREZ, JESUS ALVAREZ and JOET ALVERDIN-HERNANDEZ**, knowingly and willfully conspired and agreed together and with each other, and with other persons both known and unknown to the grand jury to transfer, possess or use, without lawful authority, a means of identification of another person with the intent to commit, or to aid or abet, any unlawful activity that constitutes a violation of federal law or that constitutes a felony under an applicable law of the State of Mississippi, as prohibited by Section 1028(a)(7), Title 18, United States Code.

All in violation of Section 1028(f), Title 18, United States Code..

Count 3

On or about January 17, 2014, in Jones County in the Eastern Division of the Southern District of Mississippi and elsewhere, the defendants, **LORENA GOMEZ, JOSE MARETLL RIVERA a/k/a Carlos, YOLANDA JEAN PERKINS, DEBORAH PAYTON STEWART, SOLOMON ROBOLLAR-OSORIO, ARTURO ROBOLLAR-OSORIO, JORGE BARRAGAN-MUNGUIA, DANIEL CARDENAS, JAVIER GUITERREZ-PULIDO, JOSE MORENO-VARGAS, JOSE MORENO-CHAVEZ, JUAN CHAVEZ-MORFIN, JOEL CABALLERO, JUSTO LEMUS PEREZ, JESUS ALVAREZ and JOET ALVERDIN-HERNANDEZ**, aided and abetted by one another, did knowingly transfer, possess or use, without lawful authority, a means of identification of another person with the intent to commit, or to aid or abet, any unlawful activity that constitutes a violation of federal law or that constitutes a felony under an applicable law of the State of Mississippi.

In violation of Sections 1028(a)(7) and 2, Title 18, United States Code.

NOTICE OF FORFEITURE

As a result of the offenses specified in this indictment, the defendants, **LORENA GOMEZ, JOSE MARTELL RIVERA a/k/a Carlos, YOLANDA JEAN PERKINS, DEBORAH PAYTON STEWART, SOLOMON ROBOLLAR-OSORIO, ARTURO ROBOLLAR-OSORIO, JORGE BARRAGAN-MUNGUIA, DANIEL CARDENAS, JAVIER GUITERREZ-PULIDO, JOSE MORENO-VARGAS, JOSE MORENO-CHAVEZ, JUAN CHAVEZ-MORFIN, JOEL CABALLERO, JUSTO LEMUS PEREZ, JESUS ALVAREZ and JOET ALVERDIN-HERNANDEZ**, shall forfeit to the United States any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such violations, and any property used, or intended to be used, to commit such

violations.

Further, if any of the property described above, as a result of any acts or omissions of the defendants: (a) cannot be located upon exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of any other property of the defendants, **LORENA GOMEZ, JOSE MARTELL RIVERA a/k/a Carlos, YOLANDA JEAN PERKINS, DEBORAH PAYTON STEWART, SOLOMON ROBOLLAR-OSORIO, ARTURO ROBOLLAR-OSORIO, JORGE BARRAGAN-MUNGUIA, DANIEL CARDENAS, JAVIER GUITERREZ-PULIDO, JOSE MORENO-VARGAS, JOSE MORENO-CHAVEZ, JUAN CHAVEZ-MORFIN, JOEL CABALLERO, JUSTO LEMUS PEREZ, JESUS ALVAREZ and JOET ALVERDIN-HERNANDEZ**, up to the value of the property described above.

All pursuant to Sections 981, 982, 1028, and 1028A, Title 18, United States Code, and Section 2461, Title 28, United States Code.



GREGORY K. DAVIS
United States Attorney

A TRUE BILL:

s/ signature redacted
Foreperson of the Grand Jury

This indictment was returned in open court by the foreperson or deputy foreperson of the grand jury on this the 19th day of February, 2014.



Linda R. Anderson
UNITED STATES MAGISTRATE JUDGE